

Vonda Long-Dillard Associate Director

Federal Relations

AT&T Services, Inc. 1120 20th St. NW, Suite 1000 Washington, D.C. 20036 Phone 202 457-2043 Fax 202 457-3070 *E-Mail*: vonda.long@att.com

DOCKET FILE COPY ORIGINAL

October 18, 2013

Marlene H. Dortch Secretary Federal Communications Commission 445 12th St., SW Washington, DC 20554 ACCEPTED/FILED

OCT 18 2013

Federal Communications Commission Office of the Secretary

Re: WC Docket Nos. 10-90, 11-42 - FCC Form 481 – Carrier Annual Reporting Data Collection Form (Sections 54.313 / 54.422 Annual Reporting)

Dear Ms. Dortch:

In compliance with the aforementioned proceeding, AT&T is filing redacted FCC Form 481 reports for the following wireless entities.

| STUDY AREA CODE (SAC) | SAC NAME FOR WIRELESS ELIGIBLE TELECOMMUNICATIONS CARRIERS | STATE |
|--------------------------|--|-------------|
| 619004 | NEW CINGULAR WIRELESS PCS, LLC | ALASKA |
| 259908 | AT&T MOBILITY, LLC | ALABAMA |
| 409004 | NEW CINGULAR WIRELESS PCS, LLC | ARKANSAS |
| 479006 | NEW CINGULAR WIRELESS PCS, LLC | IDAHO |
| 269905 | NEW CINGULAR WIRELESS PCS, LLC | KENTUCKY |
| 279010 | NEW CINGULAR WIRELESS PCS, LLC | LOUISIANA |
| 319026 | NEW CINGULAR WIRELESS PCS, LLC | MICHIGAN |
| 289912 | NEW CINGULAR WIRELESS PCS, LLC | MISSISSIPPI |
| 389015 | NEW CINGULAR WIRELESS PCS, LLC | NO. DAKOTA |
| 539010 | AT&T MOBILITY, LLC | OREGON |
| 639005 | AT&T MOBILITY PUERTO RICO, INC | PUERTO RICO |
| 399015 | AT&T MOBILITY, LLC | SO. DAKOTA |
| 449022 | NEW CINGULAR WIRELESS PCS, LLC | TEXAS |
| 199009 | AT&T MOBILITY, LLC | VIRGINIA |
| 529910 | AT&T MOBILITY, LLC | WASHINGTON |
| 339920 | NEW CINGULAR WIRELESS PCS, LLC | WISCONSIN |
| 209012 | NEW CINGULAR WIRELESS PCS, LLC | W. VIRGINIA |
| 259005 | CORR WIRELESS COMMUNICATIONS, LLC | ALABAMA |
| 229014 | GEORGIA RSA #8 PARTNERSHIP | GEORGIA |
| | | |

If you have questions, please contact me at (202) 457 – 2043.

Sincerely,

/s/ Vonda T. Long-Dillard

Attachments

 A^{\perp}

| () , | | FOC Form 481 D _{inth} 2000-0000 |
|--|--|--|
| | 481 - Carrier Annual Reporting | Okie 2000-0819 Kvy. bydair Estinaka yer Ruspondonti: 70 Hous |
| Data Coll | ection Form | And the second s |
| <010> 5 | tudy Area Code | 259908 |
| <015> 5 | tudy Area Name | AT&T Mobility LLC |
| <020> f | Program Year | 2014 |
| <030> (| ontact Name: Person USAC should contact with questions about this data | Vonda Long-Dillard |
| <035> (| Contact Telephone Number: Number of the person identified in data line <030> | 202-457-2043 |
| <039> | Contact Email: mail of the person identified in data line <030> | VL4468@att.com |
| ANNUAL | REPORTING FOR ALL CARRIERS | S4.313 S4.422 Completion Required Required |
| <100> | Service Quality Improvement Reporting | (check box when complete) (complete attached worksheet) √ |
| <200> <210> | Outage Reporting (voice) < check box if no out | (complete attached worksheet) |
| <310> | Unfulfilled Service Requests (voice) Detail on Attempts (voice) Unfulfilled Service Requests (broadband) Detail on Attempts (broadband) | 6 (attach descriptive document) (attach descriptive document) |
| <400> <410> <420> <440> <450> | Number of Complaints per 1,000 customers (voice) Fixed Mobile 0.20828 Number of Complaints per 1,000 customers (broadband) Fixed Mobile | |
| <500> <510> <600> <610> <700> <710> <800> <900> <1000> <1010> | Service Quality Standards & Consumer Protection Rules of Functionality in Emergency Situations Company Price Offerings (voice) Company Price Offerings (broadband) Operating Companies and Affiliates Tribal Land Offerings (Y/N)? Voice Services Rate Comparability Terrestrial Backhaul (Y/N)? | Compliance (check to indicate certification) (attached descriptive document) (check to indicate certification) (attached descriptive document) (complete attached worksheet) (complete attached worksheet) (complete attached worksheet) (if yes, complete attached worksheet) (check to indicate certification) (attach descriptive document) (if not, check to indicate certification) (complete attached worksheet) |
| <2000> <2005> | Rate of Return Carriers, Proceed to <u>ROR Additional Do</u> | (check to indicate certification) (complete attached worksheet) |
| <3005> | | |

| :010> | Study Area Code | 259908 |
|-------|---|---|
| (015> | Study Area Name | AT&T Mobility LLC |
| <020> | Program Year | 2014 |
| <030> | Contact Name - Person USAC should contact regarding this data | Vonda Long-Dillard |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 202-457-2043 |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | <u>VL4468@att.com</u> |
| <110> | Has your company received its ETC certification from the FCC? | (yes / no) no |
| | If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 | |
| <111> | year plan" filed with the FCC? | (yes / no) |
| <112> | If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service. Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which receives only frozen support, your progress report is only required to address voice telephony service Please check these boxes below to confirm that the attached PDF, on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate. | 259908AL112.pdf Name of Attached Document (.pdf) |
| <113> | Maps detailing progress towards meeting plan targets | |
| <114> | Report how much universal service (USF) support was received | <u> </u> |
| <115> | How (USF) was used to improve service quality | |
| <116> | How (USF)was used to improve service coverage | · · · |
| | How (USF) was used to improve service capacity | • |

LINE 200 ATTACHMENT

| 1000 | perating Comparises and Affiliates Rection Form | ELIING SAN | FCC Form 481 OMB Control No. 3060-098 OMB Control No. 3060-081 July 2013 |
|-------|--|-----------------------|---|
| :010> | Study Area Code | 259908 | |
| :015> | Study Area Name | AT&T Mobility LLC | |
| :020> | Program Year | 2014 | |
| :030> | Contact Name - Person USAC should contact regarding this data | Vonda Long-Dillard | · · · · · · · · · · · · · · · · · · · |
| :035> | Contact Telephone Number - Number of person identified in data line <030> | 202-457-2043 | |
| 039> | Contact Email Address - Email Address of person identified in data line <030> | VL4468@att.com | |
| 810> | Reporting Carrier | AT&T Mobility, LLC | |
| 811> | Holding Company | | g Distance, BellSouth Mobile Data, Inc. |
| 812> | Operating Company | AT&T Mobility Corpora | - · · · · · · · · · · · · · · · · · · · |
| :813> | - 40 | <32> | 43> |
| .613/ | Affiliates | SAC | Doing Business As Company or Brand Designation |
| | New Cingular Wireless PCS, LLC (f/k/a ALLIED WIRELESS OF THE PALMETTO STATE, LLC | 249020 | U-LIFELINE WIRELESS |
| | AT&T COMMUNICATIONS OF NEW YORK | 159010 | Ceased being ETC on 8/1/13 |
| | AT&T CORP | 549004 | AT&T Corp. |
| | AT&T MOBILITY, LLC | 199009 | AT&T Mobility |
| | AT&T MOBILITY, LLC | 259908 | AT&T Mobility |
| | AT&T MOBILITY, LLC | 399015 | AT&T Mobility |
| | AT&T MOBILITY, LLC | 529910 | AT&T Mobility |
| | AT&T MOBILITY, LLC | 539010 | AT&T Mobility |
| | AT&T MOBILITY PUERTO RICO, INC | 639005 | AT&T Mobility |
| | BELLSOUTH TELECOMMUNICATIONS, LLC | 215191 | AT&T Florida |
| | BELLSOUTH TELECOMMUNICATIONS, LLC | 225192 | AT&T Georgia |
| | BELLSOUTH TELECOMMUNICATIONS, LLC | 235193 | AT&T North Carolina |
| | BELLSOUTH TELECOMMUNICATIONS, LLC | 245194 | AT&T South Carolina |
| | BELLSOUTH TELECOMMUNICATIONS, LLC | 255181 | AT&T Alabama |
| | BELLSOUTH TELECOMMUNICATIONS, LLC | 265182 | AT&T Kentucky |
| | BELLSOUTH TELECOMMUNICATIONS, LLC | 275183 | AT&T Louisiana |
| | BELLSOUTH TELECOMMUNICATIONS, LLC | 285184 | AT&T Mississippi |
| | BELLSOUTH TELECOMMUNICATIONS, LLC | 295185 | AT&T Tennessee |
| | CORR WIRELESS COMMUNICATIONS, LLC | 259005 | CORR WIRELESS |
| | GEORGIA RSA#8 PARTNERSHIP | 229014 | ALLIED WIRELESS |
| | ILLINOIS BELL TELEPHONE COMPANY | 345070 | AT&T Illinois |
| | INDIANA BELL TELEPHONE COMPANY, INC | 325080 | AT&T Indiana |
| | MICHIGAN BELL TELEPHONE COMPANY | 315090 | AT&T Michigan |
| | NEVADA BELL TELEPHONE COMPANY | 555173 | AT&T Nevada |
| | NEW CINCULAR WIRELESS PCS, LLC | 209012 | AT&T Mobility |
| | NEW CINGULAR WIRELESS PCS, LLC NEW CINGULAR WIRELESS PCS, LLC | 269905 279010 | AT&T Mobility AT&T Mobility |
| | | 1 2/9010 | A 1 & 1 IVIODIIITV |

| (800) Operating Companies and Affiliates Data Collection Form | | FCC Form 481 OMB Control No. 3050-0985 OMB Control No. 3060-0819 |
|--|-------------------------------------|--|
| | | July 2013 |
| <010> Study Area Code | 259908 | |
| <015> Study Area Name | AT&T Mobility LLC | |
| <020> Program Year | 2014 | |
| <030> Contact Name - Person USAC should contact regarding this data | Vonda Long-Dillard | *** |
| | | |
| | | |
| <039> Contact Email Address - Email Address of person identified in da | ta line <030> <u>VL4468@att.com</u> | |
| <810> Reporting Carrier | AT&T Mobility, LLC | |
| <811> Holding Company | | Distance, BellSouth Mobile Data, Inc. |
| <812> Operating Company | AT&T Mobility Corpora | |
| <813> Ca15 Affiliates | SAC | ce35 Doing Business As Company or Brand Designation |
| NEW CINGULAR WIRELESS PCS, LLC | 319026 | AT&T Mobility |
| NEW CINGULAR WIRELESS PCS, LLC | 339920 | AT&T Mobility |
| NEW CINGULAR WIRELESS PCS, LLC | 389015 | AT&T Mobility |
| NEW CINGULAR WIRELESS PCS, LLC | 409004 | AT&T Mobility |
| NEW CINGULAR WIRELESS PCS, LLC | 449022 | AT&T Mobility |
| NEW CINGULAR WIRELESS PCS, LLC | 479006 | AT&T Mobility |
| NEW CINGULAR WIRELESS PCS, LLC | 619004 | AT&T Mobility |
| PACIFIC BELL TELEPHONE COMPANY | 545170 | AT&T California |
| SOUTHWESTERN BELL TELEPHONE COMPANY | 405211 | AT&T Arkansas |
| SOUTHWESTERN BELL TELEPHONE COMPANY | 415214 | AT&T Kansas |
| SOUTHWESTERN BELL TELEPHONE COMPANY | 425213 | AT&T Missouri |
| SOUTHWESTERN BELL TELEPHONE COMPANY | 435215 | AT&T Oklahoma |
| SOUTHWESTERN BELL TELEPHONE COMPANY | 445216 | AT&T Texas |
| THE OHIO BELL TELEPHONE COMPANY | 305150 | AT&T Ohio |
| THE SOUTHERN NEW ENGLAND TELEPHONE CO. | 135200 | AT&T Connecticut |
| WISCONSIN BELL, INC | 335220 | AT&T Wisconsin |
| | | |
| | | |
| | | |
| | | |
| | | |

| 5.1.00007551.3065800 | bal Lands Reporting lection Form | | FCC Form 48 1. OMB Castrol No. 3060-0986 OMB Control No. 3080-0819 July 2013 |
|----------------------|---|-------------------------------|--|
| <010> | Study Area Code | 259908 | |
| <015> | Study Area Name | AT&T Mobility LLC | |
| <020> | Program Year | 2014 | |
| <030> | Contact Name - Person USAC should contact regarding this data | Vonda Long-Dillard | |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 202-457-2043 | ************************************** |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | VL4468@att.com | |
| <910> | Tribal Land(s) on which ETC Serves | Poarch Creek (No High | Cost Funds were spent on the Tribal Lands) |
| <920> | Tribal Government Engagement Obligation | Name of Attached Document (.p | odf) |

If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

| | | (Yes,No, NA) |
|-------|---|-----------------|
| <921> | Needs assessment and deployment planning with a focus on | NA |
| | Tribal community anchor institutions; | |
| <922> | Feasibility and sustainability planning; | NA |
| <923> | Marketing services in a culturally sensitive manner; | NA |
| <924> | Compliance with Rights of way processes | NA |
| <925> | Compliance with Land Use permitting requirements | NA |
| <926> | Compliance with Facilities Siting rules | NA |
| <927> | Compliance with Environmental Review processes | NA |
| <928> | Compliance with Cultural Preservation review processes | NA |
| <929> | Compliance with Tribal Business and Licensing requirements. | NA |

| Ufeline | erms and Condition for Lifeline Customers lection Form | | | | FCC Form 481 OMB Control No. 3060-0986 OMB Control No. 3060-0919 July 2013 |
|------------------|---|--------------------|--------------------|------------------|---|
| <010> | Study Area Code | | 259908 | | |
| <015> | Study Area Name | | AT&T Mobility LLC | | |
| <020> | Program Year | | 2014 | - | |
| <030> | Contact Name - Person USAC should contact regarding this data | | Vonda Long-Dillard | | |
| <035> | Contact Telephone Number - Number of person identified in data | a line <030> | 202-457-2043 | | * |
| <039> | Contact Email Address - Email Address of person identified in dat | a line <030> | VL4468@att.com | | |
| <1210> <1220> | Terms & Conditions of Voice Telephony Lifeline Plans Link to Public Website | Name of attached d | | resources/commun | ity-support/lifeline-link-up.jsp |
| <1221> | Please check these boxes below to confirm that the attached PDI on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report: Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | , | | | |
| <1222> | Details on the number of minutes provided as part of the plan, | ✓ | | | |
| <1223> | Additional charges for toll calls, and rates for each such plan. | ~ | | | |
| | | | | | |

| <010> Study Area Code 259908 <015> Study Area Name AT&T Mobility LLC <020> Program Year 2014 <030> Contact Name - Person USAC should contact regarding this data Vonda Long-Dillard (259908 - AL Bob Tracy) <035> Contact Telephone Number - Number of person identified in data line <030> 202-457-2043 <0399 Contact Email Address - Email Address of person identified in data line <030> YL4468@att.com | | | |
|---|-------|---|--|
| Contact Telephone Number - Number of person identified in data line <030> Contact Telephone Number - Number of person identified in data line <030> | <010> | Study Area Code | 259908 |
| <020> Program Year 2014 <030> Contact Name - Person USAC should contact regarding this data Vonda Long-Dillard (259908 - At Bob Tracy) <035> Contact Telephone Number - Number of person identified in data line <030> 202-457-2043 | <015> | Study Area Name | AT&T Mobility LLC |
| <035> Contact Telephone Number - Number of person identified in data line <030> 202-457-2043 | <020> | Program Year | William Control of the Control of th |
| <035> Contact Telephone Number · Number of person identified in data line <030> 202-457-2043 | <030> | Contact Name - Person USAC should contact regarding this data | Vonda Long-Dillard (259908 - Al Rob Trary) |
| <039> Contact Email Address - Email Address of person identified in data line <030> VI_4468@att.com | <035> | Contact Telephone Number - Number of person identified in data line <030> | |
| | <039> | Contact Email Address - Email Address of person identified in data line <030> | VL4468@att.com |

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

| of the report to the best of my knowledge, | ling carrier; my responsibilities include ensuric the information reported on this form and in | g the accuracy of the annual reporting re any attachments is accurate. | equirements |
|---|---|---|--|
| T&T Mobility LLC | | | |
| Caredo 7 | January - | Date 4-26 | -13 |
| oe Larussa | | | *************************************** |
| P & General Manager - Gulf S | itates, AT&T Mobility Corporation, the manage | of AT&T Mobility LLC | |
| 04-830-1877 | | | |
| 9908 | Filing Due Date for this form: | 10/15/2013 | |
| | o the best of my knowledge, (&T Mobility LLC e Larussa P & General Manager - Gulf S 04-830-1877 | o the best of my knowledge, the information reported on this form and in a f&T Mobility LLC e Larussa P & General Manager - Gulf States, AT&T Mobility Corporation, the manager 04-830-1877 | Date 9-26 e Larussa P & General Manager - Gulf States, AT&T Mobility Corporation, the manager of AT&T Mobility LLC 24-830-1877 |

Attachments

LINE 100 ATTACHMENTS

Exhibit 259908AL310

AT&T MOBILITY'S REPORT OF UNFULFILLED REQUESTS FOR SERVICE FOR THE 2012 CALENDAR YEAR

| Number of Unfulfilled | Description of How Coming M. All |
|-----------------------|---|
| Requests for Service | Description of How Service Was Attempted |
| 6 | Section 54.313(a)(3) of the Commission's rules requires an ETC to report the number of requests for service from potential customers within the ETC's designated service area that were unfulfilled during the past year. The filing must also detail how the ETC attempted to provide service to those potential customers. In response to a request for service, AT&T Mobility takes the following steps: |
| | AT&T Mobility will provide service on a timely basis to requesting customers within AT&T Mobility's service area where AT&T Mobility's network already passes the potential customer's premises; |
| | 2) If a customer cannot be served by AT&T Mobility's existing facilities, AT&T Mobility will provide service within a reasonable period of time, if service can be provided at reasonable cost by: |
| | a) Modifying or replacing the requesting customer's equipment; |
| | b) Deploying a roof-mounted antenna or other equipment; |
| | c) Adjusting the nearest cell tower; |
| | d) Adjusting network or customer facilities |
| | e) Reselling services from another carrier's facilities to provide service; or |
| | f) Employing, leasing or constructing an additional cell site, cell extender, repeater, or other similar equipment. |
| | If, after these steps, the customer cannot be served, AT&T Mobility will notify the customer and provide the Commission with an annual report of how many requests for service could not be filled. |
| | |

Exhibit 259908AL510 - Consumer Protection Compliance

The Wireless Association

Steve Largent
President/CEO

CC: Marty Hambon

August 27, 2012

Mr. Ralph de la Vega President and Chief Executive Officer AT&T Mobility & Consumer Markets AT&T 1025 Lenox Park Boulevard, Suite B650 Atlanta, GA 30319

Dear Ralph:

Congratulations! This letter is to notify you that AT&T Mobility has completed the recertification process for the CTIA Business Continuity/Disaster Recovery Program ("Program") for the period July 1, 2012– June 30, 2013. CTIA deems AT&T Mobility is compliant with the principles and objectives of the Program and confirms AT&T Mobility has recertified that it has implemented and maintained the requirements set forth in the Program.

Please ensure that the relevant employees of AT&T Mobility are aware of your recertification status. If you should have any questions concerning the certification process, please contact Michael Altschul, CTIA's Senior Vice President & General Counsel, at (202) 736-3248 or <a href="mailto:mailto

CTIA commends AT&T Mobility for its ongoing leadership and participation in the CTIA Business Continuity/Disaster Recovery Program, and we look forward to continuing to work with AT&T Mobility on this important industry initiative.

Sincerely,

Steve Largent

cc:

Bruce Lundeen BCP Standards & Practices AT&T Business Continuity Planning



Exhibit 259908AL510 - Consumer Protection Compliance

Steve Largent President/CEO

Expanding the Wireless Frontier

August 16, 2012

Mr. Ralph de la Vega President and CEO AT&T Mobility Services, LLC 1025 Lenox Park Boulevard, B650 Atlanta, GA 30319

Dear Ralph:

Congratulations! This letter is to notify you that AT&T Mobility ("AT&T") has completed the recertification process for the CTIA Consumer Code for Wireless Service ("Voluntary Consumer Code") for the period January 1, 2012 - December 31, 2012, and is deemed compliant with the principles, disclosures and practices set forth in the Voluntary Consumer Code. Accordingly, AT&T is authorized to use and display the CTIA Seal of Wireless Quality/Consumer Information, subject to the terms and conditions set forth in the attached License Agreement.

Please ensure that the relevant employees of AT&T review the License Agreement before using the Seal. Use of the Seal constitutes acceptance of these terms and conditions. Upon request, we will provide two specimens (color and black/white) of the Seal for AT&T's use on If you should have any questions concerning the its website or collateral materials. recertification process or use of the Seal, please contact Michael Altschul, CTIA's Senior Vice President & General Counsel, at (202) 736-3248 or maltschul@ctia.org..

CTIA commends AT&T for its ongoing leadership and participation in the CTIA Voluntary Consumer Code, and we look forward to continuing to work with AT&T on this important industry initiative.

Sincerely,

Steve Largent

Attachment

cc: Martin Grambow

Conjuntulations!



Exhibit 259908AL510 - Consumer Protection Compliance

The Wireless Association'

Expanding the Wireless Frontier

SEAL OF WIRELESS QUALITY/CONSUMER INFORMATION

LICENSE AGREEMENT

Company is hereby granted a non-exclusive, world-wide, royalty-free license to use CTIA's Seal of Wireless Quality/Consumer Information ("Seal") to represent that Company voluntarily adopts and follows the CTIA Consumer Code for Wireless Service and has certified such to CTIA.

CTIA permits the use of appropriate references to CTIA and the Seal solely in connection with the CTIA Consumer Code for Wireless Service Program. References to the Seal shall not be misleading as to the extent of Company's voluntary support and participation in the CTIA Voluntary Code for Consumer Information program. The Seal may appear in Company's advertising, promotional material or other literature to indicate its voluntary and consistent application of the CTIA Consumer Code for Wireless Service.

Upon CTIA's acknowledgement of Company's certification, CTIA shall supply Company with a specimen of the Seal. Company shall not modify or alter the Seal without prior written permission from CTIA, and such permission shall not be unreasonably withheld. Company agrees to amend or discontinue the use of the Seal upon written request of CTIA. Company shall immediately cease use of the seal upon receipt of CTIA's written notice to do so.

Company assumes full and complete responsibility for its use of the Seal, and agrees that its use of the Seal constitutes a declaration that Company voluntarily adopts and follows the principles set forth in the CTIA Consumer Code for Wireless Service.

Use of the Seal for other purposes than those stated in this License Agreement is an unauthorized use of the Seal and is strictly prohibited.

This license may be renewed annually subject to Company's successful completion of the certification process.

Use of the Seal constitutes acceptance of these legal terms and conditions.



3

Exhibit 259908AL610

Functionality in Emergency Situations Certification

Section 54.313(a)(6) requires an ETC to certify it is able to function in emergency situations as set forth in C.F.R. Section 54.202(a)(2). The standards set forth in Section 54.202(a)(2) include a reasonable amount of back-up power to ensure functionality without an external power source, an ability to reroute traffic around damaged facilities, and a capability to manage traffic spikes resulting from emergency situations. AT&T Mobility LLC, dba AT&T Mobility, has in place emergency operation procedures so that it can function in an emergency. Backup power is provided at switch locations and cell sites through a combination of batteries and portable and/or permanent generators. AT&T Mobility LLC, dba AT&T Mobility, also has mobile switches and portable COWS (Cells on Wheels) that it can deploy in the event of an emergency.

Based on the foregoing, AT&T Mobility LLC, dba AT&T Mobility, certifies it is able to function in emergency situations as forth in C.F.R. Section 54.202(a)(2).